

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

JAN 25 2023

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,

)

Plaintiff,

)

vs.

)

MARQUET JOHNSON,

)

Defendant.

)

CRIMINAL NO. 23-92 KWR

) Count 1: 18 U.S.C. § 242: Deprivation of
Rights Under Color of Law;

) Count 2: 18 U.S.C. § 924(c)(1)(A)(ii):
Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of
Violence, and Possessing and Brandishing a
Firearm in Furtherance of Such Crime.

INDICTMENT

The Grand Jury charges:

Introduction

At all times relevant to this Indictment:

1. The defendant, **MARQUET JOHNSON**, worked as a prisoner transport officer for Inmate Services Corporation (“ISC”).
2. Local jails and prisons throughout the United States of America hired ISC to transport individuals who were arrested pursuant to out-of-state warrants.
3. The defendant, **MARQUET JOHNSON**, transported these individuals to the jurisdictions that initially issued the warrants.
4. The defendant, **MARQUET JOHNSON**, by virtue of working as a prisoner transport officer for ISC, was required to act in compliance with federal, state, and local laws, including the United States Constitution.

5. T.P. was a female in custody, arrested on an out-of-state warrant, whom the defendant, **MARQUET JOHNSON**, while acting as a prisoner transport officer, transported from Santa Fe, New Mexico to Delta County, Colorado.

6. Paragraphs One through Five are incorporated by reference in the counts below.

Count One

7. On or about November 4, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **MARQUET JOHNSON**, while acting under color of law, willfully deprived T.P. of her fundamental right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he penetrated T.P.'s vulva with his penis without her consent and without a legitimate law enforcement purpose, and the defendant's conduct included the use of a dangerous weapon and aggravated sexual abuse.

In violation of 18 U.S.C. § 242.

Count Two

8. On or about November 4, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **MARQUET JOHNSON**, knowingly used, carried, and brandished a firearm, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, to wit: the willful deprivation of T.P.'s right to bodily integrity under color of law, including the use of a dangerous weapon and aggravated sexual abuse, as charged in Count 1 of this indictment, and in furtherance of such crime of violence, possessed and brandished said firearm.

In violation of 18 U.S.C. § 924(c)(1)(A)(ii).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

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